

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FEDERAL HOUSING FINANCE AGENCY, AS
CONSERVATOR FOR THE FEDERAL NATIONAL
MORTGAGE ASSOCIATION AND THE FEDERAL
HOME LOAN MORTGAGE CORPORATION,

Plaintiff,

-against-

HSBC NORTH AMERICA HOLDINGS INC., HSBC USA
INC., HSBC MARKETS (USA) INC., HSBC BANK USA,
N.A., HSI ASSET SECURITIZATION CORPORATION,
HSBC SECURITIES (USA) INC., NEAL LEONARD,
GERARD MATTIA, TODD WHITE, and JON
VOIGTMAN,

Defendants.

11 Civ. 6189 (DLC)

JOINT MOTION TO STAY PROCEEDINGS

1. On September 12, 2014, Plaintiff Federal Housing Finance Agency, as Conservator of the Federal Home Loan Mortgage Corporation and the Federal National Mortgage Association (collectively, “Plaintiff”), and Defendants HSBC North America Holdings Inc., HSBC USA Inc., HSBC Markets (USA) Inc., HSBC Bank USA, N.A., HSI Asset Securitization Corporation, HSBC Securities (USA) Inc., Neal Leonard, Gerard Mattia, Todd White, and Jon Voigtman (collectively, the “HSBC Defendants”) entered into a settlement agreement (the “Agreement”) to resolve claims in *Federal Housing Finance Agency v. HSBC North America Holdings Inc., et al.*, No. 11 Civ. 6189 (DLC) (the “Action”).

2. Under the terms of the Agreement, Plaintiff and the HSBC Defendants (the “Parties”) agreed jointly to move for a stay of the claims against the HSBC Defendants in the Action within one business day of executing the Agreement.

3. In accordance with the terms of the Agreement, the Parties shall jointly file a stipulation of voluntary dismissal with prejudice of the Action within one business day of both GSEs’ receipt of the Settlement Payment (as defined in the Agreement). Presently, the Parties anticipate the Settlement Payment to be made on or before October 3, 2014;

4. The Parties, therefore, request that the Court enter the enclosed proposed order granting the Parties’ Motion to Stay Proceedings until the Action has been dismissed.

Dated: September 12, 2014
New York, New York

Respectfully submitted,

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